

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

3M COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 1:11cv627
	)	
CHRISTIAN INVESTMENTS LLC, D/B/A	)	
PROTECTED DOMAIN SERVICES, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF ERRATA**

Plaintiff 3M Company ("3M"), for its claims against Defendant "Arthrit," submits this Notice of Errata and states as follows:

It has come to 3M's attention that there is a minor typographical error in a certain defendant's name in the First Amended Complaint ("FAC"), and in certain subsequent filings. The domain name owned by this defendant that is involved in the lawsuit, ssswin.me, is owned in the name of "Arthit," but this name was inadvertently misspelled as "Arthrit" in the caption and in ¶ 12 of the FAC. 3M requests that this defendant's name in this lawsuit and 3M's filings be corrected and changed to "Arthit." At least one other court has found it proper to amend the caption of a lawsuit and related filings to correct the name of a defendant with a Notice of Errata, particularly where the defendant used aliases. *See Sony BMG Music Entm't et al. v. Ocapunitan Ivy AKA O.C. Ivy*, Case No. 3:08-cv-03146 (N.D. Cal. 2008) (Order granting Notice of Errata), copy attached hereto as **Ex. 1**.

The Court should have no concerns about notice with respect to this requested amendment for at least the following reasons:

1. A cease and desist letter was correctly addressed to “Arthit” alerting the defendant to 3M’s objection to his/her use of ssswin.me. See **Ex. A** to Larson Decl., attached hereto as **Ex. 2**.
2. A courtesy copy of the complaint was sent with a cover letter addressed to “Arthit.” See **Ex. B** to Larson Decl.
3. Certain filings in this lawsuit have correctly identified Arthit (e.g., Declaration of Steven Espenshade in Support of 3M’s Preliminary Injunction Motion, dkt. # 13-1, ¶ 5), as well as all Whois records relating to ssswin.me, filed as exhibits (e.g., dkt. # 13-2, p. 57).
4. “Arthit” has the same email address as “MS,” another defendant in this litigation, also subject to the pending motion for default judgment (specifically, sss\_callcenter@hotmail.com). See **Ex. C** to Larson Decl. This common email address indicates that these defendants are likely the same person (or at the very least, closely related parties). There is no question that “MS” has adequate notice of 3M’s claims here.
5. All service copies of 3M’s filings have been sent to the contact information listed for Arthit.
6. “Arthit” is likely a false name or alias given that (a) it is only one name, (b) this party also shares an email address with “MS,” and (c) this party provided other false information in connection with its Whois record (*i.e.*, physical address).

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7. The difference in spelling between "Arthit" and "Arthrit" is sufficiently minor that the defendant must know that he/she is the intended party.

WHEREFORE, 3M respectfully requests that the FAC and all previous filings, including the pending motion for default judgment and the proposed order, be so amended.

Dated: November 29, 2011

Respectfully submitted,

/s/ \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of November, 2011 I have served true and correct copies of: (1) NOTICE OF ERRATA with supporting exhibits; (2) DECLARATION OF WENDY C. LARSON IN SUPPORT OF NOTICE OF ERRATA with supporting exhibits; and (3) PROPOSED ORDER via United States mail, postage prepaid, to the following Defendants:

**Directi Internet Solutions Pvt. Ltd., D/B/A Publicdomainregistry.com, and D/B/A Privacyprotect.Org**

Directiplex, Next to Andheri Subway  
Old Nagardas Road  
Andheri (East)  
Mumbai, Maharashtra 400069  
India

**Whoisprotection.cc**

Lot 2-1, Incubator 1, Technology Park Malaysia  
Bukit Jalil  
Kuala Lumpur, Wilayah Persekutuan  
Malaysia 57000

**Marcos A/K/A 3M Specialist**

323 Srilankamatan Road  
Columbo  
Columbo, Sri Lanka 52211

**Hoon Hoe Lau**

Eitak Enterprise Limited  
406, New Village  
Ayer Tawar  
Perak Malaysia 32400

**Hyper**

Chanapai Tangneam  
13 Moo 7 Sao Thong Hin,  
Bangyai, Nonthaburi 11140,  
Thailand

**Pramote Polchocke**

Prachachuen Bangsue  
Bangkok, 10800  
Thailand

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**Bettinghouse99**

Siriwatd 144/16 bkk  
bkk, Chon Buri  
10900, Thailand

**Cat Telecom Public Company Ltd.**

99 Moo 3 Chaengwatthana Road  
Lak Si, Bangkok 10210-0298  
Thailand

**Luca Toni A/K/A Luca Tony**

Fiorentina  
Italian Street  
Genoa City, Genoa, Italy 66666

I further certify that I served the following Defendants via email, pursuant to the Court's October 3, 2011, Order, and United States mail, postage prepaid:

**K.C.**

8 King Street  
Blacktown, Victoria 3600  
Australia

**John B. LeStrange**

154/11  
Warsaw, 01-747  
Poland

**3MBKK**

Mario Beraheg  
115/6 wipawadeerugsit Road  
Dindane  
Dindane, Bangkok 10400  
Thailand

**Arthit**

SSS Company  
Bangkok  
Sa Kaew Sa Kaeo  
Thailand 27120

**Wattana**

Sudtiangtae, 111  
Hangdong, Chaingmai

Thailand 50230  
**Tharinee Pinidrak**  
570 Khannayao  
Bangkok 10230  
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